

**Commonwealth of Kentucky**  
**Division for Air Quality**  
**PERMIT STATEMENT OF BASIS**

(For permits requiring public notice)

Title V Draft No. V-98-044

MAIL-WELL LABEL USA, INC.

Bowling Green, KY 42101

May 30, 2000

REVIEWER: KUMAR POLE, P.E.

Plant I.D. # 105-3960-0097

Application Log # F504

**SOURCE DESCRIPTION:**

Mail-Well Label, Inc. manufactures printed labels for a variety of end-use applications and customers at its plant in Bowling Green, Kentucky. The plant consists of the following operational areas - Lithographic Department, Flexographic Department, Finishing Department, Maintenance/Ancillary Plant Operations.

**COMMENTS:**

1. Type of control and efficiency:

None of the significant emission points are equipped with control equipment.

2. Emission factors and their source:

- a. Emissions of VOCs and HAPs from each type of type of ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, or any other volatile material used were based on the formulation (MSDS) of each material. It was assumed that all (100%) of the VOC or HAP content would be emitted as air emissions.
- b. Emission from the natural gas fired boilers were based on AP-42 emission factors.

3. Applicable regulations:

- a. Regulation 401 KAR 59:212, *New graphics arts facilities using rotogravure and flexography*, applies to each flexographic press at the facility. However, the facility is exempt from the VOC standards under Section 3 since the permittee has elected to comply with the exemptions under Section 6 of this regulation. Pursuant to this exemption, the permittee will only use inks whose volatile portion consists of seventy-five (75) volume percent water and twenty-five (25) volume percent organic solvent (or a lower VOC content) in all flexographic printing units.
- b. Regulation 401 KAR 59:185, *New solvent metal cleaning equipment*, applies to the MNT-004 Parts Washer unit. The unit is considered a "cold cleaner" and is required to comply with the requirements of Section 4 of this regulation. Given the low level of emissions from this unit, it has been designated as an insignificant activity. However, this does not exempt the permittee from compliance with 59:185.
- c. Regulation 401 KAR 59:015, *New indirect heat exchangers*, applies to the two natural gas fired boilers at the facility, each with a capacity of 5.23 mmBTU/hr. This regulation prescribes allowable emission rates for sulfur dioxide and particulate matter. Based on their rated capacity, both boilers have been designated as insignificant activities. Since the boilers use only natural gas as a fuel, they are expected to easily comply with the emission limits.

3. Applicable regulations: (continued)

- d. Regulation 401 KAR 59:010, *New process operations*, applies to the Paper Scrap System and the Sheeter Trim Waste System. Both these activities have been designated as insignificant activities.

4. Anything unusual about the:

- a. Emission point number and description No
- b. Regulation that are not applicable - The following regulations were considered but were determined to be non-applicable to this facility:
  - i. 401 KAR 59:210, *New fabric, vinyl, and paper surface coating operations*:  
This regulation does not apply because the facility operations are limited to printing and do not involve any surface coating of fabric, vinyl, or paper.
  - ii. 40 CFR 60 Subpart RR, *Standards of performance for pressure sensitive tape and label surface coating operations*:  
This regulation applies only to pressure sensitive tape and label material. The facility does not manufacture any pressure sensitive products nor are adhesives applied to any of the labels.
  - iii. 40 CFR 63 Subpart KK, *National emission standards for the printing and publishing industry*:  
This regulation does not apply to this facility since none of the flexographic presses operated by the permittee qualify as "wide-web flexographic presses", i.e., they are not capable of printing substrates greater than 18 inches in width.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

The permittee has elected to accept a plant-wide emission limit of 240 tons per year for VOC emissions to preclude the applicability of Regulation 401 KAR 51:017, *Prevention of Significant Deterioration (PSD) of Air Quality*. Accordingly, the permit contains requirements for the permittee to calculate and maintain records of the actual VOC emissions from the entire facility for any 12 consecutive month period.

**OPERATIONAL FLEXIBILITY:**

Not applicable

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.